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6 GRAPH FOUNDATION, INC.

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 NEO4J, INC., a Delaware corporation, and
12 NEO4J SWEDEN AB, a Swedish corporation

13 Plaintiffs,

14 vs.

15 GRAPH FOUNDATION, INC., an Ohio
corporation, GRAPHGRID, INC., and
16 ATOMRAIN, INC., a Nevada corporation

17 Defendants.
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Case No. 5:19-CV-06226-EJD

**STIPULATION EXTENDING BRIEFING
DEADLINES ON MOTION TO STRIKE
AND [PROPOSED] ORDER**

1 Plaintiffs Neo4J, Inc. and Neo4j Sweden AB (“Plaintiffs”), and Defendant Graph
 2 Foundation, Inc. (“GFI”), by and through their attorneys of record (collectively, the “Parties”),
 3 HEREBY STIPULATE AS FOLLOWS:

4 WHEREAS, GFI filed its Answer to the Amended Complaint on November 30, 2020.

5 WHEREAS, on January 7, 2021, Plaintiff filed its Motion to Strike the Fifth Affirmative
 6 Defense of GFI’s Answer to the Amended Complaint.

7 WHEREAS, pursuant to the Court’s Order on the parties’ prior stipulation [Dkt. 103],
 8 GFI’s Opposition to the Motion to Strike is currently due on February 4, 2021 and Plaintiffs Reply
 9 in support of the Motion to Strike is currently due on February 18, 2021.

10 WHEREAS, pursuant to the Court’s Order on the parties’ prior stipulation, there shall be
 11 no hearing or argument on the Motion to Strike and for the Court to rule on the motion once all
 12 briefing is complete.

13 WHEREAS, GFI has requested, and Plaintiff has agreed to a further modest extension of
 14 the deadline for GFI’s Opposition to the Motion to Strike.

15 IT IS HEREBY STIPULATED THAT:

16 1. The deadline for GFI to file its opposition to Plaintiff’s Motion to Strike is
 17 extended from February 4, 2021 to February 10, 2021.

18 2. The deadline for Plaintiff to file its reply to GFI’s opposition to Plaintiff’s Motion
 19 to Strike is extended to February 24, 2021.

20 Dated: February 2, 2021

BERGESON, LLP

21 By: /s/ John D. Pernick

22 John D. Pernick
 23 Attorneys for Defendant
 GRAPH FOUNDATION, INC.

24 Dated: February 2, 2021

HOPKINS & CARLEY

25 By: /s/ Jeffrey M. Ratinoff

26 John V. Picone III
 27 Jeffrey M. Ratinoff
 28 Attorneys for Plaintiff
 NEO4J, INC.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
2
3 DATED: _____

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10 United States District Judge
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ATTESTATION

I, John D. Pernick, am the ECF User whose identification and password are being used to file this **STIPULATION EXTENDING BRIEFING DEADLINES ON MOTION TO STRIKE AND [PROPOSED] ORDER**. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories have concurred in this filing.

Dated: February 2, 2021 By: /s/ John D. Pernick
John D. Pernick

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